

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

UNITED STATES,)	
)	
Plaintiff,)	
)	
vs.)	Cause No. 4:14CV01954 CEJ
)	
REAL PROPERTY AT 4749 EAST,)	
CONCORD, ST. LOUIS, MISSOURI,)	
63128,)	
)	
Defendant.)	

VERIFIED CLAIM OF INTEREST OF CLAIMANTS
THOMAS ANDERSON SR. AND LAURA ANDERSON

COME NOW Claimants Thomas Anderson Sr. and Laura Anderson, by and through counsel and, pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, hereby make their verified claim and assert their interest and right the Defendant *in rem* in this action.

1. Claimants are the lawful owners of Defendant real property that the Government has moved to forfeit, and therefore have a claim to and interests in the Defendant real property, to wit: the real property located at 4749 East Concord Ave., St. Louis, Missouri 63128, together with appurtenances, improvements, and attachments thereon.

2. Claimants purchased the Defendant property in 1985 and have paid for said property with legitimately derived funds.

3. Claimants were not participants in the alleged drug trafficking conspiracy described by the Government and did not authorize the use of said property to commit or facilitate such conspiracy.

WHEREFORE, Claimants Thomas Anderson Sr. and Laura Anderson demand the right to defend this action and request an Order from this Honorable Court denying the Government's Complaint, any and all relief sought by the Government therein, and for their costs and such other relief as the Court deems fit.

Respectfully submitted,

THE WELBY LAW FIRM, LLC

/s/Stephen R. Welby
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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2015, the foregoing filed was and served via the Court's CM/ECF system upon all counsel of record.

/s/Stephen R. Welby

VERIFICATION

We, Thomas Anderson Sr. and Laura Anderson, claimants herein, verify and declare under penalty of perjury that the foregoing is true and correct.

Executed on February 12th, 2015, in St. Louis, Missouri.

Thomas Anderson
THOMAS ANDERSON
Laura Anderson
LAURA ANDERSON

Subscribed and sworn to before me this 12th day of February, 2015.

AUBREE J JEHL
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Charles County
My Commission Expires: January 08, 2016
Commission Number: 12461134

AJJEHL
Notary Public

My commission expires: 08 JAN 16